

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

GE HFS HOLDINGS, INC., f/k/a)	
HELLER HEALTHCARE FINANCE, INC.,)	
	Plaintiff)
and)	
MICHAEL INGOLDSBY,)	CIVIL ACTION
	Intervenor / Plaintiff	05-CV-11128-NG
vs.)	
)	
NATIONAL UNION FIRE INSURANCE COMPANY)	
OF PITTSBURGH, PA and)	
INTERNATIONAL INSURANCE GROUP, LTD.,)	
	Defendants)

**DEFENDANT INTERNATIONAL INSURANCE GROUP, LTD.'S
MOTION FOR SUMMARY JUDGMENT**

Pursuant to Fed. R. Civ. P. 56, the defendant, International Insurance Group, Ltd., ("I.I.G.") moves for entry of summary judgment with regard to the claims of Intervenor/Plaintiff Michael Ingoldsby. As grounds for this Motion, I.I.G. states that there are no disputed material facts and that they are entitled to judgment as a matter of law. In support of their Motion, I.I.G. incorporates the attached Statement of Undisputed Material Facts and Memorandum of Law.

Respectfully submitted,
International Insurance Group,
By their Attorneys:

/s/ Syd A. Saloman
Syd A. Saloman - BBO #645267
TUCKER, HEIFETZ & SALTZMAN, LLP
100 Franklin Street, Suite 801
Boston, MA 02110
617-557-9696